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Federal Way  
Public Schools

*c: Mary Selecky  
Craig McLaughlin*

July 21, 2008

RECEIVED  
JUL 24 2008  
OFFICE OF THE GOVERNOR

The Honorable Christine Gregoire  
Office of the Governor  
P.O. Box 40002  
Olympia, WA 98504-0002

Dear Governor Gregoire:

As you may know, the Washington State Board of Health is proposing changes to the School Environmental Health and Safety Rule, Chapter 245-366 WAC. The Board is considering adopting the Proposed Rules in fall 2008, with an implementation date of fall 2010. Other than parents and family members, there is no one who cares more deeply about the health and safety of students and staff than do the 295 Superintendents who work for the citizens of the State of Washington. While many of the proposals are nice ideas, school districts are being crushed by the weight of good intentions.

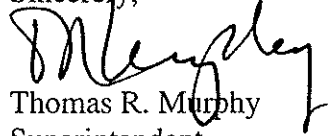
We are concerned about the unintended operational and economic impacts of the Board of Health's Proposed Rules on school districts. We estimate that it will cost Federal Way Public Schools an additional \$1.4 million in the first year to implement the Proposed Rules. To put this number into perspective, with staffing for nurses at half of the level that some would recommend (target ratio of 1 nurse to 750 students), my District currently spends \$1.4 million for nursing services. Without significant additional funding from the State to pay for the requirements imposed on school districts, Federal Way Public Schools will not be able to absorb the additional costs to implement the Proposed Rules. We are already looking at the potential of \$6 to \$8 million in cuts in the next school year.

We hope that the Board of Health will not adopt the Rules without first outlining the anticipated health benefits and the costs of each proposed change and addressing the State funding needed to implement the Proposed Rules. Your office and the Legislature need to have the opportunity to address the costs associated with Rule implementation and to consider the fiscal impacts in the context of other budget decisions. The agency rule-making process must be coordinated with the state budget process, and these steps should take place before the Board takes action. Finally, we request that the Proposed Rules not go into effect until the Legislature has provided funding to pay for the new requirements statewide.

The Honorable Christine Gregoire  
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Thank you for your attention to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Murphy", written over the printed name.

Thomas R. Murphy  
Superintendent  
Federal Way Public Schools

c: Marty Brown, Legislative Director  
Judy Hartmann, Policy Advisor  
Grace T. Yuan, K&L Gates